

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Proposed Amendments to the Service Rules	)	PS Docket No. 13-87
Governing Public Safety Narrowband	)	
Operations in the 769-775/799-805 MHz Bands	)	

**COMMENTS  
of the  
LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM**

The Los Angeles Regional Interoperable Communications System Joint Powers Authority (“LA-RICS”) hereby submits the following comments in response to the Commission’s *Notice of Proposed Rulemaking* (“NPRM”), FCC 13-40 (released April 1, 2013), in the above-captioned proceeding regarding public safety use of the 700 MHz narrowband channels.

LA-RICS was formed by the City of Los Angeles, County of Los Angeles and more than 80 other municipalities and public sector entities. LA-RICS has been working on a new multi-agency, interoperable radio communications system that will serve the over 10 million residents of the Los Angeles metropolitan area, a population that is greater than 42 of the 50 states. LA-RICS will support a total user population of more than 34,000 first responders and up to 17,000 secondary responders.

The LA-RICS mission-critical voice network had been planned for the T-Band (470-512 MHz), where most Los Angeles area public safety agencies already operate their communications systems. However, legislation adopted last year will require public safety

licensees to relinquish their T-Band spectrum for auction.<sup>1</sup> Therefore, LA-RICS has developed an alternative, hybrid approach that will migrate as much mission-critical T-Band traffic as possible to the 700 MHz narrowband spectrum by 2023, when current law requires that the T-Band spectrum be vacated. Where feasible, the hybrid system will utilize 700 MHz narrowband spectrum currently licensed to LA-RICS members. LA-RICS has also submitted a Request for Waiver to allow it to obtain licenses in the 700 MHz narrowband reserve spectrum.<sup>2</sup> Therefore, LA-RICS has a substantial interest in potential modifications to the Commission's rules regarding the 700 MHz narrowband spectrum and submits the following comments in response to the *NPRM*.

LA-RICS continues to urge the Commission to allow LA-RICS to use the narrowband reserve spectrum for its permanent voice communications system, either by granting the pending Request for Waiver or through the rulemaking process, assuming the latter can be accomplished in a timely manner. As demonstrated by a recent report of the National Public Safety Telecommunications Council ("NPSTC"), Los Angeles does not have sufficient spectrum available to compensate for the loss of the T-Band.<sup>3</sup> The Commission has long recognized the unique spectrum problems facing public safety agencies in the Los Angeles area, and previously concluded that the currently available 700 narrowband allocations are inadequate to meet the

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<sup>1</sup> Section 6103 of the Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, 126 Stat. 156 (2012).

<sup>2</sup> Request for Waiver of Section 90.531(b)(2) filed by Los Angeles Regional Interoperable Communications System Joint Powers Authority (Dec. 7, 2012); *Public Notice*, DA 13-39 (Jan. 11, 2013).

<sup>3</sup> National Public Safety Telecommunications Council, T-Band Report (Mar. 15, 2013).  
[http://www.npstc.org/download.jsp?tableId=37&column=217&id=2678&file=T\\_Band\\_Report\\_20130315.pdf](http://www.npstc.org/download.jsp?tableId=37&column=217&id=2678&file=T_Band_Report_20130315.pdf).

requirements of an area-wide voice communications network.<sup>4</sup> The narrowband reserve spectrum is critical to bridging the spectrum gap to the maximum extent possible.

The *NPRM* seeks comments on a separate proposal from NPSTC to allocate the reserve spectrum for deployable trunked systems, and whether that proposal and the LA-RICS Request for Waiver are consistent. LA-RICS believes they are, and urges that the Commission to allow the Region 5 700 MHz Regional Planning Committee to work with LA-RICS to develop the most effective and efficient use of the reserve spectrum in Southern California.

As to other matters raised in the *NPRM*, LA-RICS supports increasing power levels for the low power 700 MHz band channels to 20 watts, which will enhance on-scene emergency response communications. Low power levels for tactical communications pose particular challenges in Los Angeles, due to its difficult topography and the large number of high-rise commercial structures in the area.

LA-RICS also supports the proposed Project 25 Compliance Assessment Program, as it will promote interoperability.

LA-RICS cannot support the proposal from Dekolink to reduce ACP limits for signal boosters. There is a significant potential for intermodulation interference from signal boosters in densely populated areas such as Los Angeles.

Finally, LA-RICS opposes analog operations on the 700 MHz narrowband interoperability channels as mixed mode operation would cause confusion among first responders and actually interfere with efficient interoperability in the field.

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<sup>4</sup> County of Los Angeles, *Order*, DA 08-2823, 23 FCC Rcd 18389 (2008) (granting the County's request for waiver to utilize additional T-Band spectrum allocated for television broadcasting) .

## **CONCLUSION**

Therefore, for the reasons set forth above and in its pending Request for Waiver, LA-RICS urges the Commission to allow it to utilize the 700 MHz narrowband reserve spectrum as part of its interoperable land mobile radio system, and otherwise to amend the Commission's rules consistent with these comments.

Respectfully submitted,

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June 18, 2013